

EXHIBIT 8

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

The Lyceum,)
)
)
Plaintiff,)
)
)
v.) Case No. _____
)
)
The City of South Euclid, Ohio)
)
)
Defendant.)
)

AFFIDAVIT OF RICHARD J. WALL, Jr.

I, Richard J. Wall, Jr., hereby declare as follows:

1. I am over the age of 21 and am capable of making this declaration pursuant to 28 U.S.C. § 1746. I have not been convicted of a felony or crime involving dishonesty. I make this declaration based on my personal knowledge and experience of The Lyceum and our religious beliefs and practices.

2. I am a member and Chairman of the Board of Trustees of The Lyceum, and I assumed the role of Chairman on June 12, 2017, and the role of member on August 20, 2013.

3. The Lyceum is an independent school, governed by a Catholic board of directors who are committed to a Catholic vision of classical education.

4. The Lyceum, consistent with teachings of Holy Scripture and the Magisterium of the Catholic Church, believes that biological sex is objective and immutable; that marriage is an exclusive, lifelong union between a man and woman; and that sexual relations are properly reserved to such a marriage.

5. In light of the Ordinance, The Lyceum has drafted a policy which explains these beliefs and their implications for the school's community.

6. The Lyceum has also drafted an employment statement for its website.

7. The Lyceum's Board of Trustees, however, has not formally adopted the sexuality policy or the employment statement due to the Ordinance's ban on discrimination in employment and public accommodations based on religion, creed, marital status, sexual orientation, and gender identity or expression.

8. The Lyceum wants to publish the sexuality policy and the employment statement on its website, www.TheLyceum.org.

9. The Lyceum reasonably fears that formally adopting and publishing the written sexuality policy and employment statement would violate the Ordinance, subjecting The Lyceum to damages, costs, legal fees, and other remedial action.

10. Were it not for the Ordinance, The Lyceum's Board of Trustees would immediately pass the sexuality policy and the employment statement and post them to the school's website.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 1st day of April, 2019.



Richard J. Wall, Jr.
Member and Chairman of the Board of Trustees
The Lyceum